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September 25, 2017

VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk / Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Application of Combined Public Communications, LLC
Docket No. 2017-256-C

Dear Ms. Boyd:

Enclosed for filing please find the Testimony of Jonathan Neal Brooks, IV, on behalf of Combined Public Communications, LLC. If you have any questions about this filing, please have someone on your staff contact me.

Yours truly,

Frank R. Ellerbe, III

FRE:tch

Enclosure

cc w/enc: C. Lessie Hammonds, Esquire (via email)
Sharron Warren, Consultant (via email)
Tracey Dolezal (via email)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-256-C**

Application of)
Combined Public Communications, LLC)
for a Certificate of Public Convenience and Necessity)
to Provide Intrastate Resold Institutional)
Telecommunications Services and for Alternative)
Regulation Within the State of South Carolina)

**COMBINED PUBLIC COMMUNICATIONS, LLC
("CPC")**

TESTIMONY OF JONATHAN NEAL BROOKS IV

1 **Q. Will you please state your name and business address.**

2 A. My name is Jonathan Neal Brooks, IV. My business and mailing address is 100 Aqua
3 Drive, Cold Spring, KY 41076.
4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am the Chief Financial Officer of Combined Public Communications, LLC ("CPC"). In
7 that capacity, I am responsible for leading and managing the financial aspects of the
8 Company's business on a day-to-day basis, assisting in establishing the strategic direction
9 of the Company, evaluating new services and markets, evaluating, negotiating and
10 executing contracts and wholesale agreements with the various underlying carriers, and
11 promoting the financial health of the Company.
12

13 **Q. Please give a brief description of your background and experience.**

14 A. I received a Bachelor of Arts degree in Accounting from Bellarmine College and a Masters
15 of Business Administration from the University of Notre Dame. I worked for Arthur
16 Anderson LLP from 1992 through 2002 during which time I attained my designation as a
17 Certified Public Accountant. Beginning in 2002 I have worked for a number of companies
18 in a financial role, primarily as Chief Financial Officer and/or Vice President for Finance.
19 My experiences with these companies has given me a proven record of productive
20 leadership over all aspects of finance and operations.
21

22 **Q. What is the purpose of your testimony?**

23 A. The purpose of my testimony is to present evidence on the financial, technical and
24 managerial abilities of CPC to provide specialized institutional telecommunications
25 services to inmates and other incarcerated persons in correctional and confinement
26 institutions throughout the State of South Carolina, and to describe the service CPC
27 proposes to offer.
28

29 **Q. Has CPC registered to do business in South Carolina?**

30 A. Yes. CPC is registered to transact business in South Carolina. Our Certificate of Authority
31 is attached to our application in Exhibit A.

1 **Q. Please explain the Company's corporate structure.**

2 A. CPC was originally incorporated in the State of Ohio in November 1994 as Combined
3 Public Communications, Inc. On November 21, 2016 the Company converted to a
4 Delaware limited liability company.

5
6 **Q. Please describe the services CPC proposes to offer.**

7 A. CPC proposes to provide automated operator-assisted collect and prepaid calling services
8 to inmates and other incarcerated persons in confinement institutions throughout the State
9 of South Carolina. CPC's institutional calling services will be provided for use by inmates
10 and other incarcerated persons in confinement institutions who place calls to family
11 members, attorneys, bail bondsmen, or any other individuals the inmate is permitted to
12 contact, subject to restrictions imposed by the correctional facility management personnel.
13 CPC does not offer presubscribed services. CPC's telephone instruments are placed in
14 detention areas such as cell blocks or day rooms. Each instrument is connected to a central
15 control unit which restricts and controls calls placed by inmates. CPC's system and services
16 allow inmates and other incarcerated persons to remain in contact with family, friends and
17 other associates while still providing facility administrators with the necessary control over
18 inmate communications.

19 Automated collect or prepaid calls may be placed by inmates within the confinement
20 facility. These calls are then backhauled to the Public Switched Telephone Network using
21 third-party vendors. CPC's system is designed so that calls are completed only to those
22 called parties who specifically accept the charges for a call. Equipment utilized by CPC
23 requires a positive response from the called party before the connection is established and
24 billing can begin.

1 In addition to call processing, CPC's systems offer restrictive call blocking and screening.
2 These features provide the correctional facility with the maximum degree of control over
3 telecommunications services and help to minimize fraud. Call blocking prevents calls to
4 directory assistance, "0-", 800 numbers, pay-per-call services, and emergency numbers
5 (including 911) in order to reduce prank calls and fraudulent use of long distance services.
6 Access to other interexchange carriers is also denied. Call screening serves to eliminate
7 harassing or threatening calls to individuals such as judges, sheriffs, witnesses or jury
8 members. These two features also allow the institution to enforce telephone curfews
9 (without manual intervention) by pre-setting the hours during which the system will
10 process calls from a given telephone instrument.

11 As an institutional services provider, CPC does not have presubscribed customers and does
12 not bill directly for its service. As a result, CPC does not assign telephone numbers. CPC's
13 institutional calling services are for the use of inmates and other incarcerated persons in
14 confinement institutions who place calls to family members, attorneys, bail bondsmen, or
15 any other individuals the inmate is permitted to contact, subject to restrictions imposed by
16 the correctional facility management personnel.

17
18 **Q. Does CPC own any network switches or transmission facilities used in routing calls?**

19 A. No, CPC uses third-party vendors to deliver calls.
20

21 **Q. How are billing errors, complaints and trouble reports handled?**

22 A. CPC provides strong customer support service. For customer service inquiries, customers
23 can either email or call a CPC representative. CPC's contact information is available on
24 the website. CPCs hours of operation are Monday through Friday 8:00 AM to 8:00 PM
25 and Saturday 2:00 PM to 6:00 PM EST, closed Sundays and major holidays. Customers
26 placing calls after hours may leave a voice mail which will be returned the following day.

1 When circumstances require, additional support is provided from the Company's
2 headquarters location between 9am and 5pm weekdays.

3
4 **Q. Where is CPC currently certificated?**

5 A. CPC is currently certificated in the following state jurisdictions: Alabama, Florida,
6 Georgia, Illinois, Indiana, Kansas, Kentucky, Mississippi, North Carolina, Ohio,
7 and Tennessee.

8
9 **Q. Describe CPCs financial ability to operate as a telecommunications provider.**

10 A. CPC has sufficient financial resources to successfully operate in South Carolina. As
11 evidence of the viability of its financial plans, CPC has provided its confidential financial
12 statements under seal to the Commission.

13
14 **Q. Where in South Carolina does CPC intend to offer its services?**

15 A. CPC intends to offer its correctional calling services throughout the entire State of South
16 Carolina.

17
18 **Q. Has CPC requested alternative regulation of its interexchange services?**

19 A. CPC requests that it be allowed to file a tariff that includes maximum rates for its services,
20 accompanied by a current price list showing rates at or below the maximum rates. CPC
21 further requests the authority to revise its current price list below the maximum rates by
22 filing revised price lists from time to time. CPC commits that its actual charges at any
23 point in time will be the charges shown on the current price list on file with the Commission
24 and the Office of Regulatory Staff.

25
26 **Q. Why is the company seeking exemptions from any rules requiring that its books be
27 kept in conformance with the uniform system of accounts?**

28 A. The USOA was developed by the Federal Communications Commission as a means of

1 regulating telecommunications companies subject to rate base regulation. As a competitive
2 carrier, CPC will not be subject to rate base regulation and therefore requests Commission
3 approval for CPC to maintain its books in accordance with Generally Accepted Accounting
4 Principals ("GAAP").

5
6 **Q. Why are you seeking a waiver of the requirement that your books and records be**
7 **kept in South Carolina pursuant to 26 SC Regs. 103-610?**

8 A. CPC's principal office is located in Kentucky, and in the absence of such a waiver, CPC
9 would have to assume additional expenses to maintain records and reports in an office in
10 South Carolina. CPC will maintain the required records at its headquarters and will make
11 them available to the Commission and ORS upon request.

12
13 **Q. How will South Carolina consumers benefit from CPC's services?**

14 A. Certification of CPC will serve the public interest by allowing competitive carriers to enter
15 the institutional calling services market, offering new and better technology in the
16 provision of service and additional choices for institutional communications, thus reducing
17 costs and improving security.

18
19 **Q. Does this conclude your testimony?**

20 A. Yes.

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CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Sowell Gray Robinson Stepp & Laffitte, LLC, have this day caused to be served upon the person(s) named below the Testimony of Jonathan Neal Brooks IV on behalf of Combined Public Communications, LLC in the foregoing matter by placing copies of same in the U.S. Mail addressed as follows:

C. Lessie Hammonds, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
lhammon@regstaff.sc.gov

Dated at Columbia, South Carolina this 25th day of September, 2017.


